

WORK ASSIGNMENT NO. 1-03  
Technical/Regulatory Support for Subpart W of NESHAPS  
WAM: Rosnick

**PURPOSE AND SCOPE**

Under this Work Assignment, SC&A will provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m<sup>2</sup>-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so. The purpose of this Work Assignment is to provide follow-on contractor support for the development of a draft Background Information Document (BID) to support EPA's rulemaking efforts to determine if modification of Subpart W is warranted.

**TECHNICAL STATUS**

*Progress Made During Period:*

SC&A continued its efforts to coordinate the development of portions of the BID in accordance to the outlines agreed to with EPA in an earlier task assignment; however, the effort has been significantly slowed due to lack of additional hours being available.

SC&A continued to coordinate on the risk assessments being done under Task 1-04, as they will be integral to the drafting of the BID; we await their input on the risk analysis for the three facilities still covered under Subpart W.

SC&A previously requested that the WAM consider the need for 200-300 additional hours to enable completion of the BID project. During late October, the WAM indicated that no additional hours could be extended for Task 1-03 at this time; however, the pending approval of a related Task 1-09 would possibly facilitate the completion of the BID.

*Difficulties Encountered and Remedial Action Taken:*

SC&A has identified the need for 200 to 300 hours to enable completion of the task. The WAM has requested additional support, but has advised SC&A they are not available at this time. It was expected the Work Plan for a related task (WA 1-09) would be approved, enabling continued progress on both tasks. Since EPA has not approved the Work Plan for WA 1-09, neither task can progress without EPA action.

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*Anticipated Activity Next Period:*

SC&A will limit its efforts towards drafting of the initial chapters of a proposed BID document in December, due to the need for additional hours.

*Schedule of Deliverables Next Period:*

SC&A has no formal submissions due during December.

**OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION**

SC&A requires extension of task milestones, the addition of 200-300 hours, and expedited approval and full funding of related WA 1-09.

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<b>OVERALL FINANCIAL INFORMATION</b>				
	<u>Current</u>		<u>Cumulative</u>	
	<u>Hours</u>	<u>Amount</u>	<u>Hours</u>	<u>Amount</u>
Amount Claimed	25.0	\$3,504.36	240.5	\$32,892.42
Amount Shown on Work Plan			362.0	\$45,366.00
Amount Paid				\$25,981.68
Amount Suspended				\$0.00
Amount Disallowed				\$0.00
Remaining Amount			121.5	\$12,473.58
Unbilled Allowable Costs		\$0.00		\$0.00
Labor Estimates for Next Period			5.0	\$600.00
Estimate to Complete			121.5	\$12,473.58
Estimated Percentage of Completion, based on LOE				66%

<b>LABOR SUMMARY</b>									
		<u>Current</u>		<u>Cumulative</u>		<u>Negotiated (Work Plan)</u>		<u>Remaining</u>	
		<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>
P4	SC&A	24.00	3,356.59	228.50	31,323.79	350.00	43,006.00	121.50	11,682.21
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P3	SC&A	1.00	101.27	12.00	1,170.36	12.00	1,088.00	0.00	(82.36)
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Technician	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clerical	SC&A	1.00	46.51	8.75	397.07	16.00	983.00	7.25	585.93
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		25.00	3,504.37	240.50	32,891.22	362.00	45,077.00	121.50	12,185.78
<b>Average Hourly Rate (Labor)</b>					<b>\$136.76</b>	<b>\$124.52</b>			

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<b>ODC DETAIL INFORMATION</b>		
Item	Current	Cumulative
Publications/Subscriptions	\$0.00	\$0.00
Computer Supplies/Usage	\$0.00	\$0.00
Meetings/Travel	\$0.00	\$0.00
Supplies/Materials	\$0.00	\$0.00
Reproduction/Graphics	\$0.00	\$1.07
Telephone/Fax	\$0.00	\$0.00
Typing/Clerical	\$0.00	\$0.00
Postage/Delivery	\$0.00	\$0.00
Other	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>	<b>\$1.07</b>
Sub ODCs	-	-
Burden on ODCs (including Sub ODCs)	\$0.00	\$0.13

<b>WORK HOUR DETAIL THIS PERIOD</b>		
	<b>Name</b>	<b>Hours</b>
P-4 Labor	H. Pettengill	22
	A. Zeitoun	2
P-3 Labor	L. Loomis	1
P-2 Labor	None	-
P-1 Labor	None	-
Technician Labor	None	-
Clerical Labor	Clerical	1